

# CBC Response to Ofcom consultation titled – An approach to DAB coverage planning

*This memorandum is written on behalf of*  
**CBC – Christian Broadcasting Council**



CBC Administration, 28 Ferndown Road, Mottingham, London SE9 5JE  
Tel: 0208 294 0658 Email: [info@cbc.org.uk](mailto:info@cbc.org.uk) Web: [www.cbc.org.uk](http://www.cbc.org.uk)  
CBC Broadcasting Consultant, 10 Primrose Lane, Old Fallings, Wolverhampton WV10 8RS  
Tel: 0844 811 2610 Email: [peter.wilson@hnbt.org.uk](mailto:peter.wilson@hnbt.org.uk) Web: [www.hnbt.org.uk](http://www.hnbt.org.uk)

The Christian Broadcasting Council of the United Kingdom (CBC) wishes to give our views regarding Ofcom's consultation on an approach to DAB coverage planning, published in June 2011. We give below our responses to the question that Ofcom has posed in this consultation.

**1. Do you agree with our approach of matching DAB to FM within defined editorial areas? (Ofcom will seek comments on specific editorial boundaries via separate consultations if and when specific changes are proposed.)**

Yes we do.

**2. Do you agree with our approach to determining the extent of existing FM coverage, and which of the three field strength levels should be used to define the FM coverage that DAB should match?**

When it comes to determining the existing FM coverage we agree with Ofcom's approach.

With regard to DAB coverage we believe that this should be as robust as possible. We therefore support the figures of 69/77 dB (uV/m) for robust indoor portables coverage in the respective rural & suburban and dense urban parts of the UK. We also agree that 58 dB (uV/m) is the correct figure for in-vehicle reception.

The consultant author of this CBC response would add that having replaced his new car's standard AM/FM radio with a DAB/FM/LW/MW car radio + a new DAB external aerial that the DAB reception of national stations such as BBC Radio 4, Jazz FM National, Premier and UCB UK has been as good, if not better, than those from the five national FM stations. These journeys have included long drives from Dorset to Hertfordshire and from the Staffordshire to East Yorkshire. The reception, however, from some local and regional DAB transmitters has been more inconsistent and therefore the need for robust transmissions across appropriate local and regional DAB multiplex transmission areas is vital.

**3. Do you agree with our approach to determining the extent of existing DAB coverage and its relation to the approach we take for FM?**

Yes we do.

**4. Are the assumptions we make about needing to predict DAB in-vehicle coverage for 99% of the time and for 99% of locations the right ones?**

These assumptions would be the correct ones in our view.

**5. Should the principle of merging editorial areas be explored, as a way of improving coverage?**

These proposed editorial areas for the local DAB areas are appropriate.

However we note that for some existing local commercial analogue services, especially in parts of Wales and northern Scotland, that these editorial areas will be too large.

We therefore welcomed the pledge given by all political parties during the debate on the Bishop of Manchester's amendment to Clause 30 of the Digital Economy Act 2010, and since endorsed by the previous and present Governments, that FM is to be kept for these small local stations and community radio operators.

**6. Above and beyond the frequency changes proposed in this document, should further changes to frequency allocations be explored, as a way of improving coverage?**

We believe that there needs to be further changes to improve coverage in some local areas as well as extending national commercial DAB coverage.

We highlight below some areas that, we feel, need further investigation:

1. We welcome the news that a DAB channel has been identified that would enable the services being carried on Digital 1 to be extended to cover Northern Ireland. We also note that previously 11D had been allocated to Digital 1 coverage of the Isle of Man but no mention of such increased coverage is made in this consultation.

2. With regard to the States of Jersey and of the States of Guernsey & Dependencies we note that there is no mention, in this consultation, of there being any local or national commercial DAB coverage for those islands. The BBC has already extended the coverage of their national multiplex (12B) to the Channel Islands. In previous Ofcom documents it was reported that 5C had previously been allocated to cover Jersey, 11C for the Channel Islands and 12A for Guernsey yet these frequency allocations are not mentioned.

3. As noted above 5C was previously allocated for use to cover Jersey. As this frequency had been allocated to the UK we would suggest that there maybe possible additional use of the 5C

frequency in other parts of the country to help further improve DAB coverage. We note that previously 5A had only been allocated for use in Suffolk but in the current plan it has also been allocated to Derbyshire and Oxfordshire.

4. We believe that work needs to be undertaken to extend the coverage of some of the local multiplexes such as the Kent coast, Norwich, Peterborough and Wolverhampton/Shropshire in order that neighbouring un-served areas receive robust local DAB services.

5. We note that parts of some of the Welsh DAB multiplex areas will not receive coverage under the existing plan due to possible interference with television transmissions in the Republic of Ireland. We wonder if use of additional frequencies or different frequencies for affected areas might alleviate the problem.

We hope that our comments are of help to the Ofcom in their decisions with regard to future of DAB broadcasting.

Yours truly,

J Peter Wilson  
Consultant to CBC on Broadcasting Regulation

Mrs Olave Snelling  
Chairman of the CBC Executive

12 September 2011

*The Christian Broadcasting Council, known as CBC, was founded in 1983:*

- ✓ *To stimulate and promote the knowledge of the Christian faith and the propagation of the Gospel of Jesus Christ through the broadcasting media in the United Kingdom.*
- ✓ *To encourage the highest standards of Christian media communication.*
- ✓ *To support and develop the knowledge and standards of all those involved in broadcasting.*
- ✓ *To bring together in fellowship those working in broadcasting and those who support the vision of CBC, under girding and encouraging them in their spiritual lives.*